

# United States District Court

Western

DISTRICT OF

Missouri

UNITED STATES OF AMERICA

v.

SAEL MOH'D TUMAH MUSTAFA  
[DOB: 06/16/1968]

18 U.S.C. §§ 1341 and 2  
NMT: 20 Years Imprisonment  
NMT: \$250,000 Fine  
NMT: 3 Years Supervised Release  
\$100 Mandatory Special Assessment  
Class C Felony

## CRIMINAL COMPLAINT

**Case Number:** 09-0101-SWH-01

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Between on or about November 1, 2008, and April 15, 2009, in the Western District of Missouri and elsewhere, as a result of a scheme and artifice to defraud and to obtain money by false and fraudulent representations, to wit: purchasing Hy-Vee, Nebraska Furniture Mart and other business gift cards, using unauthorized and stolen credit card information, SAEL MOH'D TUMAH MUSTAFA, defendant herein, aiding and abetting others, did knowingly cause to be deposited into the United States Postal Service packages containing Hy-Vee, Nebraska Furniture Mart and other business gift cards, to send said packages via United States Mail from the States of Iowa and Minnesota, to an address located in the Western District of Missouri, for the purpose of executing said scheme and artifice to defraud; all in violation of Title 18, United States Code, Sections 1341 and 2.

I further state that I am a Postal Inspector of the United States Postal Inspection Service and that this complaint is based on the following facts: (See attached Affidavit)

Continued on the attached sheet and made a part hereof:  Yes  No.

/s/ Rory Bryan

Inspector Rory Bryan  
United States Postal Inspection Service

Sworn to before me and subscribed in my presence,

July 24, 2009  
Date

at Kansas City, Missouri  
City and State

Sarah W. Hays, United States Magistrate Judge  
Name and Title of Judicial Officer

/s/ SARAH W. HAYS  
Signature of Judicial Officer